

I had hoped to be writing my comments to the Commission informed by the studies on media ownership that have been promised. Unfortunately, those studies have not yet been released.

As an interested, but also informed, citizen, I think it is most useful to know and understand the reasoning and data that will be informing the commissioners when they make their decision on the future of our broadcast media.

My opposition to further relaxing ownership rules--from the cross-ownership rule to the local radio ownership cap--is not based upon politics nor matter of ideology, but rather my own observations and study of the changes in our broadcast media in the last twenty-six years, especially those changes that have occurred since the 1996 Telecom Act.

Without a doubt, many aspects of our media landscape have changed in that time--and we cannot ignore the rise of the Internet. And yet, the centrality and importance of local media to communities has not changed nearly so dramatically as the large media owners would like us to think.

In the absence of the FCC's own reports on media ownership, I am informed by research reports recently released by the Media and Democracy Coalition, and the Benton Foundation and Social Science Research Council, all of which have been submitted to the Commission.

All of these researchers have found very negative effects of concentrated media ownership under the current rules. One can only predict things would worsen under looser ownership restrictions.

In particular, I note the findings that in most media markets, residents have very few sources for local news, which most people receive by television, more so than newspapers.

The need for diversity in news outlets has many practical elements. One is simply the ability of any given newsroom to cover so many stories -- indeed having more individual newsrooms means that the likelihood that a given story will be missed goes down. As it is editors and management who make the decisions of what to cover, if these decisions for both a newspaper and a TV station are assigned by the same editor or manager, there is more chance that a story will be missed.

Furthermore, separate news outlets also serve as a check-and-balance on one another. If a newspaper and TV station are co-owned and operated, what incentive does the newspaper have to cover in-depth charges of malfeasance at the TV station, or vice-versa?

Beyond simple malfeasance, different newsrooms also serve as a check on the biases of each other, whether they are partisan political, cultural or otherwise.

Living in a one-newspaper town I have very few sources of local news, although I am lucky to have three TV news sources in my market that are not co-owned or cross-owned with the newspaper. While I could wish for better local news coverage from all, I nevertheless do receive better breadth of coverage than I have observed in other less-well-endowed markets.

It would be a real loss to see that diversity further eroded by cross-ownership, with newspapers or radio stations.

I agree with Dr. Marc Cooper, of Consumer Federation of America, who notes that while there is plenty of opinion content on the Internet, there is still very little local news content for most cities and communities. I know for Champaign-Urbana, IL, there is very little original reporting available on the internet aside from what is offered by existing broadcast and print sources who maintain an internet presence.

When it comes to news on local news and issues, I find very little on the internet that isn't already available in broadcast or print. Thus the internet does not greatly increase the diversity of fact-based reporting, although there is some amount of opinion, from blogs to commercial sites.

In fact, I have seen no great enhancement or increase in the availability of local news since I moved to the area in 1993 -- several years before widespread Internet availability.

In fact, I have seen a net decrease in local news coverage as a result of the changes in radio ownership brought on by the Telecommunications Act of 1996. Presently, only two radio stations offer actual local news reporting -- one is the university-owned NPR affiliate and the other is a commercial station owned by the local newspaper.

No other commercial station group in our market offers any local news, and all commercial FM stations are owned by larger non-local broadcast companies. The consolidation of these stations in Champaign-Urbana has lessened diversity and news content. In fact, two local frequencies are now occupied by the exact same programming (95.3 and 93.5 FM, both owned by AAA Entertainment of Rhode Island).

Many of these stations are actually licensed to other smaller communities in the Champaign-Urbana area, and once served those local communities before 1996. Now, every station licensed to a community of less than 30,000 in the Champaign County area programs only to the larger cities of Champaign and Urbana, or nearby Deatur, rather than their cities of license.

Further loosening of local ownership caps, allowing there to be fewer station groups operating in my area, would only result in fewer formats with more stations airing the exact same programming. This

is as mirrored in the results of Peter DiCola's study on radio format diversity as completed for the Benton Foundation and Social Science Research Council.

In conclusion, local broadcast media is still very important to communities. From civic action--like local politics and elections--to safety and culture, local broadcast media is uniquely able to provide coverage that is difficult to receive elsewhere. Especially in mid- and small-size communities, the internet does not provide a significant number of original news and information sources that cater to localities. Opinion on local issues is present, as are internet sites for existing broadcast and print outlets. But not news.

Further loosening of media ownership caps, especially the cross-ownership rules, will hurt local communities, especially smaller communities that already have experienced dwindling service from their broadcast media. Further relaxation will not serve the public interest in any way, shape or form.